

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-45-JJF
	:	
	:	
AMANDA VELEZ,	:	
	:	
Defendant.	:	

MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

Defendant Amanda Velez, by and through her undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an order enlarging the time within which pretrial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions for this case are due by July 31, 2006.
2. Undersigned counsel was recently in a car accident and broke a bone in her neck. She temporarily is not able to appear in Court or to complete written work on the client's behalf. It is expected that she will return to work after about a month's time.
3. AUSA Douglas McCann, counsel for the government, does not oppose the defense's request for an extension.
4. Ms. Velez has no objection to the extension of time.
5. The defense agrees to waive, pursuant to the Speedy Trial Act, any additional time given in which to file pre-trial motions.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended and be due by August 31, 2006.

Respectfully Submitted,

/s/ Eleni Kousoulis
Eleni Kousoulis, Esquire
Assistant Federal Public Defender
First Federal Plaza
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Defendant Amanda Velez

Dated: July 12, 2006

CERTIFICATE OF SERVICE

Undersigned counsel certifies that a copy of Defendant's Motion to Extend Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on July 12, 2006.

Douglas McCann
Assistant U.S. Attorney
1007 Orange Street
Suite 700, P.O. Box 2046
Wilmington, DE 19899-2046

/s/ Eleni Kousoulis
Eleni Kousoulis, Esquire
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Wilmington, DE 19801
(302) 573-6010

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AMANDA VELEZ,	:	
	:	
Defendant.	:	

ORDER

Having considered Defendant's Motion to Extend Time to File Pretrial Motions,

IT IS HEREBY ORDERED this _____ day of _____, 2006, that Defendant
Velez' pretrial motions shall be due on the _____ day of _____, 2006.

Honorable Joseph J. Farnan
United States District Court